

Jackson & Son Oil

From: "Franklin, Richard" <Franklin.Richard@epa.gov>
Date: Thursday, June 18, 2015 3:04 PM
To: <jacksonoil@seasurf.net>
Subject: Upcoming EPA Spill Prevention Control and Countermeasure (SPCC) Inspection, July 9

Hi Larry,

Thanks for visiting with me this afternoon about our upcoming SPCC inspection at your facility near Seaside (Happel Lane) on the morning of July 9. As I mentioned on the call, the SPCC rules, otherwise known as the EPA's Oil Pollution Prevention regulations, have been around since 1974. They commonly apply to oil storage and handling facilities such as yours, and are found in the federal regulations at 40 CFR Part 112. If your facility falls under the regulations, there's several requirements, including a requirement for an SPCC Plan to be prepared (written) and implemented. For help with understanding the requirements, please see our website, at <http://www.epa.gov/emergencies/content/spcc/index.htm>. I've laid out some inspection information below that I hope will help you prepare for the inspection, and I'll be glad to help you via phone as well.

The Inspection. The inspection should only take a few hours, and will include a physical SPCC inspection and facility walk-around, an SPCC plan review, and a records review. We'll want to inspect the bulk fuel storage tanks, any truck loading/unloading areas, oil transfer areas and facility piping, oil drum storage, and drainage features and equipment, etc. Our team will have about 3 folks conducting the inspection.

Plan and Records review. We'll need to review your SPCC plan for compliance with the rules, and this may take 1 to 2 hours. During the on-site records review, we'd like to see and review representative copies from the last three years, of:

- facility inspection records that are called for in the Plan, such as inspections for tanks, piping, railcar unloading racks, etc.
- tank integrity inspection records, such as SP001 or API 653 inspections and reports.
- facility drainage records
- SPCC annual training records (sign in sheet) and topics. Perhaps an agenda or presentation that was done.

Safety - For the on-site visit itself, we'll want to make sure we have the appropriate personal protective equipment that you require. We'll bring steel-toed boots or shoes, hard hats, safety glasses, and hearing protection if needed. Please let me know if you require any other protective equipment.

As you go thru this, please feel free to call me anytime. Email or cell (below) might be best, as I'm traveling a lot these days. I am in the office today and tomorrow.

Regards,

Richard Franklin
Federal On-Scene Coordinator

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